

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

Case No. 2:17-cv-442-JRG
Lead Case

JURY TRIAL DEMANDED

v.

SAMSUNG ELECTRONICS AMERICA, INC.
and SAMSUNG ELECTRONICS CO., LTD.,

Defendants.

Case No. 2:17-cv-441-JRG
Consolidated Case

**SAMSUNG NOTICE OF NON-OPPOSITION TO
GOOGLE’S MOTION TO ESTABLISH PROCEDURE
FOR RESOLVING REMAINING CLAIM CONSTRUCTION DISPUTES**

Defendants Samsung Electronics America, Inc. (“SEA”) and Samsung Electronics Co., Ltd. (“SEC”) (collectively, “Samsung”) respectfully submit this notice to inform the Court that it does not oppose Google’s Motion To Establish Procedure for Resolving Remaining Claim Construction Disputes (Dkt No. 205). Google’s Motion seeks to establish a procedure to resolve claim construction disputes identified in the parties’ P. R. 4-3 Joint Claim Construction and Prehearing Statement (Dkt No. 172) that may not be resolved by the time the Court issues its forthcoming Claim Construction Order. The parties’ P. R. 4-5 Opening and Responsive Claim Construction Briefs will address 19 of the 43 groups of disputed terms identified in the parties’ P. R. 4-3 Joint Claim Construction and Prehearing Statement. Accordingly, Samsung reserves all rights to eventually brief any of the remaining roughly 24 groups of disputed terms as the

Court determines is necessary.

Samsung is willing to address the remaining groups of terms according to Google's proposal, which entails the filing of Materiality Statements for the remaining disputed claim terms within 14 days of receiving the Court's Claim Construction Order, or at a later time closer to trial, to the extent that the un-briefed terms remain in dispute. Samsung thus does not oppose Google's Motion.

Dated: June 26, 2018

Respectfully submitted,

/s/ Stephen A. Marshall

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INC. and SAMSUNG ELECTRONICS CO.,
LTD.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on June 26, 2018 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Stephen A. Marshall
Stephen A. Marshall